

Dear Sirs,

I am an unlicensed operator (Wireless ISP) as well as a traditional dialup internet service provider located in Kansas. We have been in business for almost 7 years as a ISP.

About 2 years people started to want higher speeds the only way we found this was possible was by doing wireless service due to the monopolies the telecos and cable providers have on their respective markets. About the same time both DSL and cable service started to be available in the area however due to costs neither the cable company or the phone company are interested in providing service to the extreme rural areas in between the small towns. This leads to a big gap of under served population.

Thanks to the ISM and UNI rules we have been able to capture and provide service to these rural areas and provide high speed to the people out on the country sides.

However the current rules and regulations provides limited opportunity to reach a broader range of consumers where foliage and extreme long distances can block access to the only means of broadband internet access they might have besides high latency satellite service which have major drawbacks and there are a lot of internet services that do not function good over satellite due to this extreme latencies.

I am in favor of using the TV bands as there is a lot of spectrum that could be utilized for none line of sight high speed internet access.

1) Opening up this spectrum would allow us and many others to provide service to business and households currently not reachable under current rules. Manufacturers of equipment for use in this spectrum could easily solve the issues of operating only on unused channels as well as picking a channel that has guard band channels on each side.

2) Power levels in rural areas should be allowed to be higher than urban areas. A typical cell site in our area with a 10 mile radius might have less then 500 possible users with maybe only 50 probable. Bigger cells would allow for more economical cells and even more areas could easily be covered. One big issue that we run into is to find vertical real-estate and with higher power levels and frequencies that work better through foliage we could then extend our cell size.

3: There some equipment out there that already uses GPS for operations and some equipment that can push a lot of bandwidth in just a few MHz wide channel. So to get this type of adoptive equipment would be possible to get manufactured and designed in a very short period of time. A 6Mhz wide TV channel would provide plenty of room for very decent bandwidth of digital data.

4) The commission should specify the power and interference levels and the channel widths and let the manufacturers and WISPs innovate when it comes to the protocols and delivery mechanisms.

WISPs have been able to provide service to small business and residential users in areas in our nation where phone companies and cable companies' et al have currently deemed it unprofitable to provide service. Expanding the unlicensed spectrum and allow for more flexible rules in the urban low populated areas will continue the success WISP's have had to try ensure that everyone can have broadband access no matter where they live.

Respectfully,
Eje Gustafsson
Owner Family Entertainment Network LLC

